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3 **UNITED STATES DISTRICT COURT**
4 **NORTHERN DISTRICT OF CALIFORNIA**
5 **OAKLAND DIVISION**
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7 IN RE CALIFORNIA BAIL BOND
8 ANTITRUST LITIGATION
9
10 THIS DOCUMENT RELATES TO:
11 ALL ACTIONS
12

Master Docket No. 19-cv-00717-JST-DMR
CLASS ACTION

**STIPULATION AND ~~PROPOSED~~
ORDER RE: EXTENSION TO FILE
THIRD CONSOLIDATED AMENDED
COMPLAINT**

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1 Pursuant to Civil Local Rule 6-2, all Plaintiffs and Defendants (the “Parties”) in the
 2 above-entitled action stipulate as follows:

3 **WHEREAS**, the Court ordered the Parties to proceed with discovery on December 10,
 4 2020, with Dismissed Defendants¹ to submit pre-amendment discovery focused on deficiencies
 5 the Court identified in Plaintiffs’ Second Amended Complaint (ECF No. 151);

6 **WHEREAS**, the Court referred the management of discovery in this case, “including the
 7 issues set forth in the [P]arties’ joint case management statement, ECF No. 173,” to Magistrate
 8 Judge Ryu on January 25, 2021 (ECF No. 175);

9 **WHEREAS**, the deadline for Plaintiffs to file their Third Consolidated Amended
 10 Complaint (“TCAC”) is January 10, 2022 (ECF No. 237);

11 **WHEREAS**, on August 12, 2021, Plaintiffs and Dismissed Defendants submitted to
 12 Judge Ryu a dispute regarding the proper geographic scope of pre-amendment discovery based on
 13 certain search terms and custodians (ECF No. 208);

14 **WHEREAS**, on September 30, 2021, Judge Ryu set a deadline of November 29, 2021 for
 15 Dismissed Defendants to produce all responsive documents regardless of geography, except
 16 documents that pertain solely to individual bail bond transactions outside California (ECF No.
 17 230), and related privilege logs were accordingly due by December 13, 2021 (ECF No. 183);

18 **WHEREAS**, several Dismissed Defendants were granted extensions to produce
 19 documents pursuant to Judge Ryu’s order by mid-December;

20 **WHEREAS**, Plaintiffs require time to review Dismissed Defendants’ document
 21 productions and privilege logs once produced, and may challenge entries in the latter;

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 23 ¹ For the avoidance of doubt, the Dismissed Defendants are Allegheny Casualty Company,
 24 International Fidelity Insurance Company, AIA Holdings, Inc., American Contractors Indemnity
 25 Company, Bankers Insurance Company, Accredited Surety and Casualty Company, Inc.,
 26 Lexington National Insurance Company, Seneca Insurance Company, Continental Heritage
 27 Insurance Company, Seaview Insurance Company, Danielson National Insurance Company,
 28 Financial Casualty & Surety, Inc., Indiana Lumbermens Mutual Insurance Company, Lexon
 Insurance Company, The North River Insurance Company, Philadelphia Reinsurance
 Corporation, Sun Surety Insurance Company, United States Fire Insurance Company, Universal
 Fire & Casualty Company, Williamsburg National Insurance Company, California Bail Agents
 Association, Golden State Bail Agents Association, American Bail Coalition, Inc., Two Jinn, Inc.,
 All-Pro Bail Bonds Inc., and Jerry Watson.

1 **WHEREAS**, the Parties agree to extend the deadline for Plaintiffs to file their TCAC to
2 February 25, 2022;

3 **WHEREAS**, the Court has set no further deadlines in this matter, and therefore none
4 would be affected;

5 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by and
6 between the Parties that Plaintiffs shall have until February 25, 2022 to file their TCAC.

7
8 Dated: December 29, 2021

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1 **[PROPOSED] ORDER**
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PURSUANT TO STIPULATION, IT IS SO ORDERED that Plaintiffs shall have until
February 25, 2022 to file their TCAC.

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6 Dated: January 04, 2022
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THE HONORABLE JON S. TIGAR
UNITED STATES DISTRICT JUDGE

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1 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

2 I, Adam Gitlin, attest that the concurrence in the filing of this document has been
3 obtained from the other signatories. Executed on December 29, 2021, in Richmond, California.

4 */s/ Adam Gitlin* _____

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